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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Newport, Oregon))

To: Chief, Policy and Rules Division
Mass Media Bureau

PETITION FOR RULEMAKING

1. Pursuant to Section 1.419 and 1.420 of the Commission's Rules, Charlotte McNaughton, permittee of FM Radio Station KCLM(FM), Channel 224C3, Newport, Oregon, hereby requests that the Table of Allotments for FM Broadcast Stations, Section 73.202(b), be amended to delete FM Channel 224C3 and add FM Channel 224C2 at Newport. Petitioner also requests that the KCLM(FM) permit simultaneously be modified to specify operation on Channel 224C2 (94.7 MHz).

2. The attached engineering statement of Michael D. Brown demonstrates that the requested operation on Channel 224C2 cannot occur without deletion of Channel 224C3. The engineering statement also demonstrates that the proposed Channel 224C2 operation fully complies with the Commission's minimum channel spacing and principal

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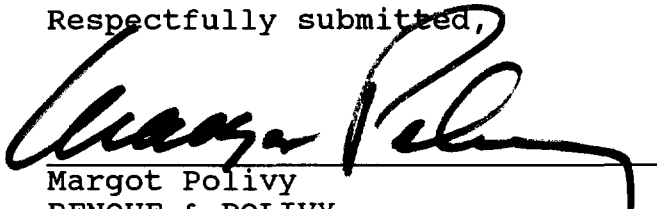
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city coverage requirements. As noted above, if the proposal is adopted, Petitioner will forthwith apply for authorization to modify the authorized facilities of KCLM to conform to the change requested.^{1/}

3. The proposed amendment of the Table of Allotments would be in the public interest in that it would enable KCLM(FM) to expand its present coverage by approximately 76%.

Therefore, it is requested that Channel 224C3, Newport, Oregon, be deleted and Channel 224C2, Newport, Oregon, be allocated in its place and that the construction permit of Station KCLM(FM) be modified to specify operation of Channel 224C2.

Respectfully submitted,



Margot Polivy
RENOUF & POLIVY
1532 Sixteenth Street, N.W.
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202.265.1807

Counsel for Charlotte McNaughton

24 March 1993

^{1/} On December 11, 1992 Charlotte McNaughton requested modification of her construction permit (BPH-910118MB) to permit specification of the antenna site referenced in this Petition for Rulemaking. The requested modification of transmitter site is currently pending (BMPH-921211IJ).

ENGINEERING EXHIBIT
FOR
PETITION FOR RULEMAKING

NEWPORT, OREGON

CHANNEL 224

CHARLOTTE MCNAUGHTON, APPLICANT

JANUARY 13, 1993

>>BROWN BROADCAST TECHNICAL CONSULTANTS<<

Michael D. Brown 3740 SW COMUS ST. PORTLAND, OREGON 97219

ENGINEERING STATEMENT

GENERAL INFORMATION

The attached engineering exhibits have been prepared on behalf of petitioner Charlotte McNaughton, holder of current FM construction permit BPH-910118MB, with pending modification BMPH921211IJ. The Petition for Rulemaking described herein requests a modification of the Table of Assignments (47 CFR, Section 73.202(b)), to add channel 224C2, and delete channel 224C3 for Newport, Oregon.

The petitioner's proposed CP modification BMPH921211IJ, now pending, specifies the same location as that referenced by this Petition for Rulemaking, but at a C3 power level (3.8kw ERP).

As shown by the attached FM Spacing Study (Exhibit E-2), the proposed channel 224C2 meets all the minimum separations required by Section 73.207, at this location. This location is well developed, with 3 other full-power FM's co-located. Good line-of-sight coverage to the city of license is available from this position. The entire city of license is very easily contained within the predicted 70 dbu contour. This hilltop is the logical and best location for a station seeking to serve the Lincoln County (& Newport city) operational area.

The area contained within the 60dbu contour of a C2 facility at this location is approximately 1.76 times that of the area covered by a C3 facility.

If this petition is granted, the petitioner will immediately submit a 301 application for a construction permit for operation on channel 224C2 at this location.

>>BROWN BROADCAST TECHNICAL CONSULTANTS<<

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INDEX OF EXHIBITS

- E-1 General Information Outline
- E-2 Spacing Study
- E-3 Coverage Contours, HAAT

EXHIBIT E-1

PROPOSED RULEMAKING -- GENERAL INFORMATION

CURRENT ALLOCATION, PART 73.202(B) TABLE OF ASSIGNMENTS:	224 <u>C</u> 3, 94.7mhz, Newport, Oregon
PROPOSED CHANGE:	224 <u>C</u> 2, 94.7mhz, Newport, Oregon
PROPOSED TRANSMITTER LOCATION:	1.4 kilometers from Otter Rock, Lincoln County, Oregon, on a bearing of 43° true; near Cape Foulweather 44°, 45', 22" North Latitude 124°, 02', 54" West Longitude
ANTENNA HEIGHT ABOVE AVERAGE TERRAIN:	256 meters (840 feet)
EFFECTIVE RADIATED POWER:	17.0kw H & V (with rounding as per 73.212(a))
FURTHEST DISTANCE TO CITY LIMITS OF CITY OF LICENSE:	14.6km
APPROXIMATE DISTANCE TO 70dbu CONTOUR ON THIS BEARING:	35km
APPROXIMATE COVERAGE AREA WITHIN PREDICTED 60dbu CONTOUR:	9180 sq. km.

EXHIBIT E-2

MICHAEL BROWN, BROWN BROADCAST TECHNICAL CONSULTANTS
PORTLAND, OR

Page 1
January 10, 1993

FM Spacing study

Title: KCLM C2
Channel 224C2 (92.7 Mhz)
Database: DW 01/08/93

Latitude: 44-45-22
Longitude: 124-02-54
Safety zone: 65 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
=====	=====	=====	=====	=====	=====	=====	=====	=====
KSYD	LIC	SCHOOL DISTRICT 4J	221A	2.78	43-43-21	181.8	114.9	55
REEDSPORT		OR BLH-900316KA	92.1	102	124-05-40	1.8	59.91	CLEAR
Deletion proposed; License Granted 02/04/91 per FCC release #21045 dated 02/08/91; Call Granted 04/28/87								

RM		DELETION REQUESTED	221A		43-43-18	181.8	115.0	55
REEDSPORT		OR RM-6194	92.1		124-05-40	1.8	60.00	CLEAR
Deletion proposed; COUNTERPROPOSAL TO DOC-87-395								

KGON	LIC	KSGO/KGON, INC.	222C	100	45-29-20	52.0	134.1	105
PORTLAND		OR BLH-900820KF	92.3	386BT	122-41-40	233.0	29.09	CLEAR
License Granted 06/05/91 per FCC release #21132 dated 06/11/91								

ALLOC			223C		47-35-48	22.1	342.5	188
SEATTLE		WA	92.5		122-19-48	203.4	154.5	CLEAR
Allocated to BELLEVUE WA								

KCLM	CP	CHARLOTTE MCNAUGHTON	224C3	12	44-45-54	85.6	13.26	177
NEWPORT		OR BPH-910118MB	92.7	144	123-52-53	265.8	-164	SHORT
CP Granted 01/29/92 per FCC release #21308 dated 02/05/92; Call Granted 02/28/92 per FCC release #177 dated 02/28/92								

KGBR	CP	SAINT MARIE COMMUNICATIO	224C1	43	42-23-44	185.6	263.5	224
GOLD BEACH		OR BPH-901214IK	92.7	420BT	124-21-47	5.4	39.49	CLEAR
CP Granted 10/30/91 per FCC release #21242 dated 11/04/91; ORDERED FROM 224A								

KAST-FM LIC		YOUNGS BAY BROADCASTING	225C1	99	46-10-54	6.7	159.6	158
ASTORIA		OR BLH-810526AL	92.9	165	123-48-19	186.9	1.572	CLOSE
Affiliated with KAST(AM)								

KSND	LIC	COMMUNITY PACIFIC BCG CO	226C	100	44-00-05	138.1	112.2	105
SPRINGFIELD-EUGENE		OR BLH-900406KB	93.1	985	123-06-48	318.8	7.186	CLOSE
See SPRINGFIELD OR; License Granted 02/01/91 per FCC release #21044 dated 02/07/91								

FM Spacing study

Title: KCLM C2 Latitude: 44-45-22
 Channel 224C2 (92.7 MHz) Longitude: 124-02-54

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Reg.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
ALLOC			226C		44-03-00	133.5	113.5	105
SPRINGFIELD	OR		93.1		123-01-06	314.2	8.531	CLOSE
Allocated to SPRINGFIELD-EUGENE OR								

KKCW	LIC	TRUMPER COMMUN OF PORTLA	277C	100	45-31-22	49.5	132.8	35
BEAVERTON	OR		103.3	504BT	122-45-12	230.5	97.80	CLEAR
S ee PORTLAND ORE								

KOPE-FM LIC MEDFORD JUDEO-CHRISTIAN 278FB 42-28-17 166.5 260.9
 GRANTS PASS OR BLFTB-910822T 103.5 123-18-12 347.0
 License Granted 04/24/92 per FCC release #21369 dated 05/01/92; Booster for KO
 PE, MEDFORD, OR

>> End of channel 224C2 study <<

EXHIBIT E-3

MICHAEL BROWN, BROWN BROADCAST TECHNICAL CONSULTANTS
PORTLAND, OR

Page 1
January 10, 1993

Service contours based on FCC F(50,50) curves

Title: KCLM C2
Channel: 224

Bearing (degrees)	HAAT (meters) (feet)	ERP (kiloWatts) (dBk)	70 dBu (3.16 mV/m) contour	60 dBu (1 mV/m) contour
.0	298.5 979.3	17.17 12.35	35.3 km 21.9 mi	55.0 km 34.2 mi
45.0	230.4 755.9	17.17 12.35	31.2 km 19.4 mi	50.1 km 31.2 mi
90.0	231.7 760.2	17.17 12.35	31.3 km 19.5 mi	50.2 km 31.2 mi
135.0	231.2 758.5	17.17 12.35	31.3 km 19.4 mi	50.2 km 31.2 mi
180.0	288.4 946.2	17.17 12.35	34.8 km 21.6 mi	54.3 km 33.7 mi
* 181.0	293.8 963.9	17.17 12.35	35.1 km 21.8 mi	54.7 km 34.0 mi
** 225.0	333.1 1092.8	17.17 12.35	37.2 km 23.1 mi	57.3 km 35.6 mi
** 270.0	333.1 1092.8	17.17 12.35	37.2 km 23.1 mi	57.3 km 35.6 mi
** 315.0	333.1 1092.8	17.17 12.35	37.2 km 23.1 mi	57.3 km 35.6 mi

HAAT:	256.0 840.0			

Notes:

- * radial not included in HAAT calculation; through city of license
- ** radials not included in HAAT calculation; over Pacific Ocean

CERTIFICATION; STATEMENT OF QUALIFICATIONS

I, Michael D. Brown am a Radio Engineer of over 18 years professional experience. I am FCC licensed and SBE certified, and owner of Brown Broadcast Technical Consultants, a Radio Engineering consulting firm. My education and experience are a matter of record with the Federal Communications Commission.

I have been retained by the applicant, Charlotte McNaughton, to prepare the engineering exhibits relative to this Petition for Rulemaking. I certify that I have prepared this exhibit on behalf of the applicant, and that after such preparation, I have examined the foregoing and found it to be accurate and true to the best of my knowledge and belief.

Michael D Brown

1/13/93

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